Root Cause Analysis Tool

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Introduction

Section II(D) of MD-715 requires that Federal EEO programs "must conduct a self-assessment on at least an annual basis to monitor progress and identify areas where barriers may operate to exclude certain groups." Part A(II) provides that "where an agency's self-assessment indicates that a racial, national origin, or gender group may have been denied access to employment opportunities, the agency must take steps to identify and eliminate the potential barrier."

Barriers are defined as policies, procedures, practices, or conditions that limit or tend to limit employment opportunities for members of a particular race, ethnic or religious background, gender, or for individuals with disabilities. While a few barriers may readily discernable, most are embedded in the agency's day-to-day employment policies, practices, and programs, including: recruitment; hiring; career development; competitive and noncompetitive promotions; training; awards and incentive programs; disciplinary actions; and separations.

A complete barrier analysis has 3 major steps:

1) Workforce Data Analysis
2) Root Cause Analysis
3) Solution Development

Workforce Data Analysis: Barrier analysis begins with an investigation to see if there are any anomalies (triggers) found after a workforce data analysis. Current workforce demographics are compared to the most recently available Civilian Labor Force (CLF) data. Ideally, the agency workforce demographic percentages (gender, race, ethnicity, etc) should be similar to those in the CLF.

Interesting information can also be gained by trend analysis over years. EEO complaint analysis can also highlight possible barriers and trends (harassment, etc). Other data tables of interest are hiring tables (snapshot and trend), promotion tables (current and trend), and awards (current and trend).

The agency's major occupation demographics should also be reviewed and compared with the relevant occupational CLF.

Comparison with Overall Federal data tables (e.g., MD 715 A&B table 1) can put the agency's workforce demographics in perspective and highlight if a possible barrier is government wide as opposed to agency specific. Comparisons with other Federal agencies, both similar (size, mission, critical occupations) and different (occupations) can also help determine if an anomaly is agency specific or a result of the type of work (mission, occupations) of the agency.

Depending on the workforce demographics, additional comparisons may be needed, refining the scale of the data analysis, until the demographic anomaly is fully identified.

Root Cause Analysis: Once the potential demographic anomalies have been identified, a barrier analysis requires that the reason why behind the numbers be identified. To completely determine all the reasons why a particular group does not fully participate in an agency's workforce, the agency would have to conduct a complete social science study. While that might be desirable and would definitely give interesting and useable results, that is not what the MD 715 requires. MD 715 requires the agency to review its policies, procedures, practices, or conditions at various stages of the employment cycle that might limit or tend to limit employment opportunities for members of a particular group to determine what, if any, of these policies, practices, or conditions are resulting in the noted demographic anomalies. This is an internal investigation. The complete reason why a group does not fully participate in an agency's workforce may have external components.

The agency's policies, practices, and conditions affect all parts of the employment cycle. There are 7 major steps in the employment cycle and each need to be fully reviewed:
- Recruitment
- Hiring
- Promotions and other Internal Selections
- Performance Awards and other Incentives
- Training and Development Opportunities
- Disciplinary Actions
- Separations

Historically Federal agencies have not been conducting this step. In many cases EEO professionals do not have the training nor financial resources to go beyond a basic workforce analysis and conduct a root cause analysis. Additionally, there is no standard methodology developed in order to conduct an EEO related barrier analysis.

The goal of this project was to develop a standard methodology for NOAA to conduct the MD 715 required barrier analysis. It is hoped that this methodology may be useful, with modification, for other Federal agencies.

Solution Development: After the causes for the demographic anomalies in the workforce have been identified, it is incumbent on the agency to determine if those barriers are consistent with

business necessity or should be removed, and if they can and should be removed, to design and implement a plan to remove those barriers.

Root Cause Analysis Methodology and Tool Development

The methodology developed is based on the MD715 instructions to "ask questions until no more questions can be asked" about the agency's policies, procedures, and practices in regards to the seven major employment cycle steps listed above. The philosophical underpinnings of the method is one of embedded questions, one leading to another, to another, etc. until no more questions can be asked on that topic. Policies, procedures, and practices addressed in the limited number of questions listed in the MD715 instructions were included. Many additional questions were added. These questions were developed regardless of the current ability of the agency to answer the questions.

The resulting analytical tool consists of seven 'decision trees' and one 'basic questions tree.' The tree organization and implementation is reminiscent of taxonomic identification – if feathered, see bird. This analytical tool, when implemented, will result in refining areas of concern and identifying barriers to more balanced workforce demographics. It will also elucidate areas where sufficient information may not be available to answer questions and fully evaluate potential barriers. The current trees are not considered to be final. These trees are considered to be growing, with additions, modifications, and other changes to be made over time, especially as more information is available.

Below is a generic example of how a decision tree would work. Each question and answer leads to another question to be answered, eventually leading to a conclusion.

I. Is the sky completely blue?
      1. Yes
      2. No
              i. Are there clouds in the sky?
                    a. Yes
                          i.a.1. Are the clouds large, white, and puffy?
                              i.a.1.i. Yes
                              i.a.1.ii. No
                                    i.a.1.ii.a. Are the clouds like an old grey army blanket across the sky?
                                        i.a.1.ii.a.1. Yes [possible barrier, rain coming]
                                        i.a.1.ii.a.2. No
                    b. No
                          i.a.2. Is it night?
                              i.a.2.i. Yes
                              i.a.2.ii. No

This tool does have its limitations. Due to time constraints, not all question paths were developed as far as they might have been. The tool was developed for NOAA use, and so is NOAA-centric in regards to the agency organizational structure, processes, and available information. A major section that is absent from this tool are questions that address issues or concerns specific to people with disabilities, such as reasonable accommodation and accessibility. People with disabilities are included in general procedure questions, along with ethnicity/race/gender/occupation identifications.

Depending on the workforce analysis, all the trees do not have to be implemented in every case. If the 'trigger' is an imbalance in pay levels in regards to gender in an occupational series, then only the Performance Awards and Other Incentive Tree questions need to be asked. On the other hand, if the 'trigger' is an imbalance in the diversity of job applicants, then the Recruitment Tree questions would be asked. If the rate of separations for a particular group is found to be not representative, then the questions in the Separation Tree would be asked. When implementing a decision tree, the questions must be evaluated for the appropriate audience to ask the questions. Audiences could include EEO Professionals, Human Capitol/Resource Professionals, and individuals from the target group. Additionally, answers may be obtained from other sources, including databases, monitoring/tracking systems, or employee survey information.

The workflow for this methodology is as follows: The trigger is identified, the questions in the appropriate tree(s) are asked (aka 'run the tree'), and possible barriers are identified. These possible barriers are then reviewed to see if it is a 'barrier', if the 'barrier' is job related and necessary, and, for those items that are identified as barriers, what the agency can do to resolve the problem. The resulting recommendations are given to the agency's management for consideration and implementation. The barriers, resolutions, and implementation plans become input for the agency's annual MD 715 report, Part I plans.

Root Cause Analytical Tool

Assumptions: A few assumptions are made regarding the use of this tool. First, it is assumed you have already identified a 'trigger' which led to a particular ethnic/racial or gender group and occupation combination. Selecting an occupation is not necessary, but it is probably a good place to start as many of the questions address occupational issues. Secondly, a distinct group must be selected and the questions must be answered with that group in mind. For example, one question addresses EEO complaints – if the 'trigger' group is Asian female IT professionals, one looks for complaints by that group; complaints by African American male accountants are irrelevant for that barrier analysis.

Information gathering: The tool consists of questions, it does not give any indications where or from whom one might find the answers. Familiarity with the agency's organizational structure is necessary. Information to respond to the questions will need to be solicited from agency EEO

professionals, Human Capitol/Resource (HR) professionals, various databases (if available), 462 compliant forms, workforce analysis information, and many other sources. Do not forget to ask questions of the root cause analysis target group.

Instructions: To use the trees, first identify which tree(s) are appropriate for the trigger group and situation. Then begin to ask the questions, each question having a potential 'yes' or 'no' response. The 'yes' or 'no' response will lead to another question, etc. For example, the question 'Does the agency conduct mandatory exit interviews?' – the 'yes' response leads to questions regarding the time (on exit, at a later date) of the interview; a 'no' response leads to the question 'Does the agency conduct voluntary interviews?'

It might be helpful to highlight the questions asked and answered and to insert a brief phrase indicating from whom is the response and why it was captured as a 'yes' or 'no'. For example, a 'no' response in the above example could be annotated with [HR – only some agency components].

Do not be dismayed if the question cannot be answered. Remember, these questions were developed as one question lead logically to another, without any regard any expectations that any agency would be able to answer the question.

Follow the question thread or path to the end. A decision must then be made if the end resulted in a possible barrier or problem for your agency. Some possible barriers have already been identified in the tree structure. A determination must be made if the issue the question addresses is a barrier for the agency. Highlighting the possible barriers and why it might be a problem is recommended.

Continue until all necessary questions have been asked. Feel free to modify, delete, or add questions that are specific to your agency. The decision trees are at the end of the report.

Methodology Implementation

After potential barriers have been identified in the trees, these potential problems must be further evaluated to determine: 1. If it is a problem for the agency, 2. If the problem is inherent for the occupation (e.g., being a pilot has certain physical requirements); and 3. If it is a problem for the group under review.

After the above review has been conducted, a list of barriers for full participation is developed. In addition to barriers identified by the tree methodology, barriers identified from other sources (such as employee surveys or focus group discussions) should be included. For each barrier identified, a recommendation for how to remove the barrier should be developed. Depending how the agency conducts business, these recommendations will probably need upper level

managerial review and approval for adoption. Not all recommendations may be approved for immediate implementation.

Analytical Tool Results

How does this methodology help your agency? What do you do with the results?

MD 715 Part I Plans: The barriers identified in the decision trees, in combination with other information gathered about the agency's policies, procedures, and practices in order to answer the tree questions, are the foundation for the MD 715 Part I Plans. Those barrier resolutions that have been approved for adoption should be reported as a Part I Plan, along with the proposed resolution. The agency's MD 715 report and plans are now based on fact, are much more quantitative in nature, than subjective guesswork as might have been done previously.

Even if a particular policy, procedure, practice, or condition is not identified as a barrier particular for the group under investigation, that does not mean the information obtained by answering the tree question might not be valuable.

Best Practices: Parts of the agency may be conducting practices that are not common across the agency as a whole. An evaluation of these practices can determine those that can be considered to be 'best practices' and that should be adopted by the whole agency. To adopt these practices are additional recommendations that, while not specific to the group reviewed, can benefit the agency and its employees.

Missing Practices: In attempting to answer tree questions, it will soon become apparent that not all questions can be answered, possibly some very basic questions, because the needed information is not collected or tracked. Recommendations regarding not currently captured should be collected will both improve the agency and future MD 715 reports.

Agency Efficiency: While obtaining answers for the tree questions, disconnects in responses from different agency components might be found. For instance, HR staff might say that EEO officials serve on selection panels and EEO officials might say they do not.

Other Federal Agencies: This methodology was developed for NOAA and therefore is NOAA-centric. It is hoped that other Federal Agencies would find the tool useful for use in examining their policies, procedures, and practices for MD 715. In order for another agency to use the tool, the decision trees would have to be modified, especially for the agency's organizational structure. The tool is designed to grow and change as needed, both through time and across agencies.

Pilot Study: A pilot study was conducted during the 1st and 2nd quarter in 2010 in order to 'beta' test the methodology. The 'trigger', as identified by NOAA Civil Rights Office staff through a

workforce analysis during the MD 715 process, was the low participation rates of Hispanics in the Fishery Biologist (series 492) occupation. Because the primary reason to conduct this study was to test the analytical tool, all seven decision trees were utilized. Based on the study results, the decision trees were modified (the trees presented in this report are the modified trees). The pilot study also resulted in 1) locating barriers to full participation of Hispanics in Fishery Biology, and 2) recommendations for changes in policies, procedures, and practices – especially in areas where there is insufficient information for evaluation

Conclusion/Summary

The goal of this project was to develop a standard methodology for NOAA to conduct the MD 715 required barrier analysis. Section II(D) of MD-715 requires that Federal EEO programs "must conduct a self-assessment on at least an annual basis to monitor progress and identify areas where barriers may operate to exclude certain groups." Part A(II) provides that "where an agency's self-assessment indicates that a racial, national origin, or gender group may have been denied access to employment opportunities, the agency must take steps to identify and eliminate the potential barrier."

Once the potential demographic anomalies have been identified, a barrier analysis requires the agency identify the reasons why the numbers are the way they are. MD 715 requires the agency to review its policies, procedures, practices, or conditions that might limit or tend to limit employment opportunities for members of a particular group to determine what, if any, of these policies, practices, or conditions are resulting in the noted demographic anomalies. This is an internal investigation. The complete reason why a group does not fully participate in an agency's workforce may have external components.

Historically Federal agencies have not been conducting this step. Agency EEO professionals may not have the training or financial resources to conduct a root cause analysis. Additionally, there is no standard methodology developed in order to conduct an EEO related barrier analysis

This tool was developed such that individuals in agency EEO professionals could examine the policies, procedures, and practices in a standardized fashion without having to have a strong analytical or social science background. Using this tool will provide the agency information for the MD 715 Part I plans, and additionally, provide information that can improve efficiency, and highlight missing and 'best' practices. It is hoped that this methodology will be useful, with modification, for other Federal agencies.

Decision Trees

Recruitment, Hiring and Other Practices trees Basic Questions

I. Have there been vacancies for this occupation?
   a. Yes
      i. How many?
      ii. What are the KSA's for this occupation?
         1. Education required?
            a. Vocational
            b. High School
            c. Bachelors
            d. Masters
            e. Doctorate
            f. Post Doctorate
         2. Salary range?
         3. Experience required?
      iii. Total number of applicants?
      iv. Do the applications note whether the applicant attended any NOAA recruitment event?
         1. Yes
            a. Is this information tracked to evaluate recruitment effectiveness?
               i. Yes
               ii. No [Possible barrier to future evaluation and program improvement]
         2. No [Possible barrier to future evaluation and program improvement]
      v. Do the applications note how the individual heard about the job opening?
         1. Yes
         2. No
      vi. Is the applicant pool in parity with the RCLF?
         1. Yes [Go to Hiring tree]

        2. No [Go to Recruitment and Hiring trees]

    vii. Are there employee 'feeder' groups that tend to be used by the agency (e.g., interns, contractors, fellows, etc.)?

        1. Yes

            a. Are these groups in parity with the RCLF?

                i. Yes [Go to Hiring tree]

                ii. No [Go to Recruitment tree]

        2. No

b. No [End to both Recruitment and Hiring trees, nothing to evaluate]

Recruitment Tree

I. Is the group aware of NOAA?
- c. Yes
    - i. Is NOAA considered to be a good employer?
        1. Yes
        2. No
            - a. Does NOAA have a good reputation?
                - i. Yes
                - ii. No
                    - 1. Have you, your friends or mentor had a previous experience with NOAA OR have you heard rumors or gossip about working for NOAA?
                        - a. Yes
                            - i. Was it positive or negative?
                            - ii. Positive
                                - iii. What was positive?
                            - iv. Negative
                                - v. What was negative?
                            - vi. Did this experience or rumors influence your decision to apply or not for a NOAA job?
                            - vii. Yes
                            - viii. No
                            - ix. No
                        - b. No
                - b. No
- d. No

II. Are there professional societies or associations for this occupation?
- a. Yes
    - i. Does NOAA Workforce Management know/interact with the professional societies or associations?
        1. Yes
        2. No

b. No

III. Are there societies or associations targeting this racial/ethnic/gender group?

    a. Yes

        i. Does NOAA Workforce Management know/interact with these racial/ethnic/gender societies or associations?

            1. Yes

            2. No

        ii. Is there a mechanism for a school to request recruitment?

            1. Yes

            2. No

    b. No

IV. Are there schools/colleges specializing in this occupation?

    a. Yes

        i. Does NOAA Workforce Management know/interact with these schools/colleges specializing in this occupation?

            1. Yes

            2. No

    b. No

V. Are there schools/colleges targeting this racial/ethnic/gender group?

    a. Yes

        i. Does NOAA Workforce Management know/interact with these schools/colleges targeting this racial/ethnic/gender group?

            1. Yes

            2. No

    b. No

VI. Is there a NOAA-wide recruitment schedule?

    a. Yes

    b. No

        i. Do various offices and programs develop their own recruitment schedules

            1. Yes

                a. Are these schedules coordinated with the rest of the agency?

                    i. Yes

                    ii. No [Possible barrier in efficiency]

            2. No

VII. Does the agency have recruitment materials?

    a. Yes

        i. Are these materials current?

       1. Yes
       2. No
  ii. Are the materials updated at least annually?
       1. Yes
       2. No
 iii. Are there culturally/racially/ethnically/gender specific or sensitive materials?
       1. Yes
       2. No [Possible barrier]
 iv. Are the materials agency wide?
       1. Yes
       2. No
          a. Are the materials office or program specific?
             i. Yes
            ii. No
  v. Are recruiters aware of these materials?
       1. Yes
          a. Do recruiters use these materials?
             i. Yes
            ii. No [Why not, possible barrier]
       2. No [Possible barrier]
 vi. Does the agency have a recruitment oriented website?
       1. Yes
          a. Does the website reflect diversity?
             i. Yes
                1. Is the website current?
                   a. Yes
                   b. No [Possible barrier]
                2. Does the website have sufficient and accurate information?
                   a. Yes
                   b. No [Possible barrier]
             ii. No [Possible barrier]
          b. Does the website have recruitment schedule posted?
             i. Yes
            ii. No

2. No
   a. Do various offices or programs have a recruitment oriented website?
      i. Yes
         1. Are these websites coordinated within the agency?
            a. Yes
            b. No [Possible barrier]
         2. Are the websites current?
            a. Yes
            b. No [Possible barrier]
         3. Do the websites have sufficient and accurate information?
            a. Yes
            b. No [Possible barrier]
      ii. No
   b. No [Barrier]
VIII. Does the agency have a process to evaluate recruitment efforts?
   a. Yes
   b. No [Possible barrier]
IX. Does the agency have recruiters?
   a. Yes
      i. Is there an agency recruitment team?
      ii. Yes
         1. Does each LO have representation?
            a. Yes
            b. No
      iii. No
         1. Does each LO have recruiters?
            a. Yes
               i. Do these recruiters communicate and coordinate activities effectively across the agency?
                  1. Yes
               ii. No [Possible barrier in efficiency]
            b. No
      iv. Are the recruiters diverse (age, ethnicity, race, gender)?
         1. Yes

2. No [Possible barrier if applicants don't 'see' themselves or recruiters are not racially/ethnically/gender sensitive and able to address specific concerns]

v. Is there recruiter training?
   1. Yes
      a. Is training provided to all recruiters?
         i. Yes
            1. Is this training sufficient?
               a. Yes
               b. No [Possible barrier]
         ii. No [Possible barrier]
      b.
   2. No [Possible barrier]

vi. Are recruiters aware of Federal hiring principles?
   1. Yes
   2. No [Possible barrier]

vii. Are recruiters aware of NOAA's Education Strategic Plan Goal 2?
   1. Yes
   2. No

b. No [Barrier]

X. Is there a targeted recruitment activity for this group?
a. Yes
   i. Are the appropriate schools/colleges being targeted?
      1. Yes
      2. No
   ii. Are the appropriate professional societies or associations being targeted?
      1. Yes
      2. No
   iii. Are the appropriate ethnic/racial/gender associations or societies being targeted?
      1. Yes
      2. No
   iv. Is the targeted recruitment strategy NOAA-wide in both theory and implementation?
      1. Yes
      2. No
         a. Do various offices and programs develop their own recruitment strategies?

         i. Yes

              1.   Are these strategies coordinated with the rest of the agency?

                  a. Yes

                  b. No [Possible barrier in efficiency]

         ii. No

    b. No

XI. Are Federal open job positions easy to find?

    a. Yes

    b. No

XII. Is the USA Jobs application process easy to use?

    a. Yes

    b. No

Hiring Tree

I. Is the applicant pool in parity with the RCLF?

1. Yes
   a. Are the 'highly qualified' selections on par with the RCLF?
      i. Yes
         1. Were interviews given in parity with the RCLF?
            a. Yes
            b. No
         2. Were position offers in parity with the RCLF?
            a. Yes
            b. No
         3. Were the vacancies filled on par with the RCLF?
            a. Yes [No problem]
            b. No
               i. Is the selection process reviewed periodically to ensure equal treatment?
                  1. Yes
                  2. No
               ii. Are managers aware of hiring authorities?
                  1. Yes
                  2. No
                     a. Are there communications methods available?
                        i. Yes
                           i.a. Are they being used?
                              i.a.1. Yes
                              i.a.2. No
                        ii. No
                  3. Do managers use the NOAA Manager's Hiring Guide?
                     a. Yes

        b.   No
- i. Is the use of the Manager's Hiring Guide required?
  - i.a. Yes
  - i.b. No

iii. Are hiring and selection officials trained and skilled in interviewing across race/gender/culture?
1. Yes
2. No
   - a. Is there training available to acquire interviewing skills?
     - i. Yes
       - i.a. Are managers taking this training?
         - i.a.1. Yes
         - i.a.2. No [Possible barrier]
     - ii. No

iv. Are hiring and selection officials aware of hiring priorities?
1. Yes
2. No
   - a. Are there communication methods available?
     - i. Yes
     - ii. No

v. Is the selection non-parity agency wide?
1. Yes
2. No
   - a. Is the selection non-parity specific to an office or program?
     - i. Yes
       - i.a. Is the selection non-parity specific to individual selecting official(s)?
         - i.a.1. Yes
         - i.a.2. No
     - ii. No

vi. Are selection panels used?
1. Yes
   - a. How is it determined who serves on the panels?
   - b. Is EEO office consulted about panel composition?
     - i. Yes
     - ii. No

c. Is EEO office consulted regarding SES candidacy programs and succession planning?
            i. Yes
            ii. No
    2. No
    vii. Are selection requirements and procedures job-related and consistent with business necessity?
    1. Yes
    2. No
    viii. Are there a substantial number of EEO complaints where non-selection(s) is identified as the issue?
    1. Yes
        a. Is there an identifiable trend in ethnicity/race/gender or group/supervisor/facility?
            i. Yes [Possible barrier, needs to be investigated]
                i.a. Are there programs available to address the issue (training, communication)?
                    i.a.1. Yes
                            i.a.1.i. Are these programs being used?
                                    i.a.1. i.a. Yes
                                    i.a.1.i.b. No [why not? Possible barrier]
                    i.a.2. No [Possible barrier]
            ii. No [No problem]
    2. No [No problem]
    ix. Has the union, ombudsman, advocacy group, special emphasis group, or other group expressed concern regarding recent selections?
    1. Yes
        a. Were the concerns ethnic/racial or gender related?
            i. Yes
                i.a. Did the agency respond?
                    i.a.1. Yes
                            i.a.1.i. What was the response/action plan?
                    i.a.2. No
            ii. No [Not issue for this method]
    2. No
        ii. No
    2. No [see Recruitment tree]
II. Are there employee 'feeder' groups that tend to be used by the agency (interns, contractors, fellows, etc.)?
    1. Yes

a. Are these groups in parity with the RCLF?
   i. Yes
   ii. No
b. Are there mechanisms available to 'convert' feeder group individuals to permanent positions?
   i. Yes
      1. Are these mechanisms well known?
         a. Yes
         b. No
      2. Are these mechanisms well utilized?
         a. Yes
         b. No
      3. Are these mechanisms easy to use?
         a. Yes
         b. No
   ii. No
2. No

Promotions and Other Internal Selections Decision Tree

I. Of the promotions that occurred in the last fiscal year, were the selections reflective of the pool of eligible candidates?
- A. Yes
    1. Did the pool of eligible candidates include representatives from particular groups?
        - a. Yes
        - b. No
    2. If the pool of eligible candidates did not include representatives from particular groups, was consideration given to including external candidates?
        - a. Yes
        - b. No

- B. No

II. Where there are variations, are there specific areas where the variations are occurring (e.g. particular job category, particular grade, particular office, etc.?)
- A. Yes
- B. No

III. Are variations occurring in management, executive or SES selections?
- A. Yes
    1. Are such selections meeting the needs of the agency's successions plans?
        - a. Yes
        - b. No
- B. No

IV. Are there feeder groups available for each identified promotion?
- A. Yes
    1. Are those feeder groups substantially similar to the RCLF benchmark?
        - a. Yes
        - b. No
    2. If the feeder groups are not similar to the RCLF benchmark, has a determination been made as to where the disparity is occurring (e.g., recruitment, selection, promotion, etc.?)
        - a. Yes
        - b. No

3. If the feeder groups are similar to the RCLF benchmark, has a determination been made as to why the disparity appears between feeder group population and promotion selectees?
   a. Yes
   b. No

B. No

V. Is the promotion/selection process reviewed periodically to ensure equal treatment regardless of race, sex, national origin, or disability?

A. Yes

B. No

VI. Are there career ladder positions established that bridge to higher grades?

A. Yes

1. Are there career ladder positions established for mission critical occupations?
   a. Yes
   b. No

2. If no established career ladder positions have been established, is there a process in place to establish them?
   a. Yes
   b. No

B. No

VII. For career ladder positions, is there a difference in time with which one or more groups achieve their full grade potential as compared to other groups (i.e., is the time-in-grade higher for a particular group?)

A. Yes

B. No

VIII. Are employees achieving full performance for their occupation at similar rates with others of different race, national origin, sex or disability?

A. Yes

B. No

XIX. Are there promotion selection panels?

A. Yes

1. Has criteria been established on how promotion selection panels are to be formed (i.e., to ensure inclusion of minorities, women and those with disabilities?)
   a. Yes
   b. No

2. Is EEO consulted when selection panels are composed?
   a. Yes
   b. No

B. No

X. Are internal promotion qualification requirements and procedures job-related and consistent with business necessity?
    A. Yes
    B. No

XI. Do internal promotion qualification requirements and procedures include unnecessary barriers to full utilization of skills and training?
    A. Yes
    B. No

XII. If barriers are job-related and consistent with business, can the effect of the barrier be minimized nonetheless?
    A. Yes
    B. No

XIII. Are there a number of EEO complaints where non-promotion is identified as the issue?
    A. Yes
        1. Is there an identifiable trend (e.g., particular group, supervisor, or office?)
            a. Yes
                i. Is there anything being done to address this trend (train selecting officials, train employees, better communication of process and expectations?)
                    i.a. Yes
                    i.b. No
            b. No
    B. No

Performance Awards and Other Incentives Decision Tree

I. Can the workforce distribution of award recipients for the last fiscal year (grade, occupation, office, race, sex, national origin, disability, etc.) be tracked?

    A. Yes

        1. Can the distribution of award recipients be tracked by performance management system (e.g., Five-Level; CAPS; Two-Level; and SES, ST and SL?)

            a. Yes

            b. No

    B. No

II. Where more than one performance management system is used within the same Line/Corporate Office, is one system easier to understand for employees to understand than the other?

    A. Yes

    B. No

III. Of the awards given in the last fiscal year, was the rate of success substantially similar for all parts of the population?

    A. Yes

    B. No

        1. Did group(s) enjoy less success than others?

            a. Yes

                i. Are efforts being made to address why a group enjoyed less success than others?

                      i.a. Yes

                      i.b. No

            b. No

IV. Of the awards received last fiscal year, was the rate of success substantially similar for all parts of the population, regardless of the performance management system?

    A. Yes

    B. No

        1. Did groups enjoy less success than others, depending on their performance management system?

            a. Yes

                i. Are efforts being made to address why a group enjoyed less success than others based on their performance management system?

                      i.a. Yes

        i.b. No

    b. No

V. Is there a process for how award recipients are selected?

    A. Yes

        1. Are there objective criteria available for selecting officials?

            a. Yes

            b. No

    B. No

VI. Is the award selection process reviewed periodically to ensure equal treatment regardless of race, religion, sex, national origin, disability or EEO participation?

    A. Yes

    B. No

VII. Are award selection panels utilized?

    A. Yes

        1. Is there a process to determine who will serve on a panel?

            a. Yes

                i. Is EEO consulted when award selection panels are composed?

                    i.a. Yes

                       iia. Do EEO officials serve on selection panels?

                           iiia. Yes

                           iiib. No

                    i.b. No

            b. No

    B. No

VIII. Are there a substantial number of EEO complaints where award non-selection is identified as the issue?

    A. Yes

        1. Is there an identifiable trend (e.g., particular group, supervisor, or office)?

            a. Yes

                i. Is there anything being done to address this trend (objective criteria, better communication of process and expectations)?

                    i.a. Yes

                    i.b. No

            b. No

    B. No

IX. Has the union, the ombudsman, an employee advocacy group, special emphasis group, or any other interested stakeholder expressed concern regarding the distribution of awards?

A. Yes

1. Were the concerns noted?

a. Yes

b. No

2. Did NOAA respond to the group or interested stake holder?

a. Yes.

i. Was acknowledgment of the response received?

ia. Yes

ib. No

ii. Does NOAA have a plan of action to address the concern?

ii.a. Yes

ii.b. No

b. No

B. No

X. Do all employees who are rated eligible receive an award?

A. Yes

B. No

XI. Do individuals who collaborate on the same project receive the same form of recognition?

A. Yes

B. No

XII. Are non-monetary awards given?

A. Yes

B. No

XIII. Can the workforce distribution of non-monetary award recipients for the last fiscal year (grade, occupation, office, race, sex, national origin, disability, etc.) be tracked?

A. Yes

B. No

XIV. Are all managers made aware of the various performance awards available at NOAA?

A. Yes

1. Do managers/supervisor refer to the NOAA Supervisors Resource Guide for Awards?

a. Yes

b. No

2. Do managers/supervisors refer to the NOAA Administrative Order 202-451-NOAA Incentive Awards Program?

a. Yes

b. No

B. No

XV. Are rating officials aware of their responsibilities as outlined in Section 4 of NAO 202-451?

A. Yes

B. No

XVI. Is each Corporate/Line Office aware of their responsibilities as outlined in Section 4 of the NAO 202-451?

A. Yes

B. No

XVII. Do managers/supervisors refer to the NOAA Incentive Awards Program Handbook?

A. No

B. Yes

XVIII. Are all employees made aware of the various awards available to them?

A. Yes

B. No

XIX. Are employees made aware of the eligibility requirements of receiving an award?

A. Yes

B. No

XX. Are the reasons why an employee receives an award openly shared with co-workers/peers?

A. Yes

B. No

Employee Development and Training Opportunities Decision Tree

I. Are training and development opportunities communicated to all employees (WFMO, Corporate/Line Office, Division)?
- A. Yes
    1. Has the union, an employee advocacy group, special emphasis group or any other interested stakeholder expressed concern over the way in which these opportunities are communicated?
        - a. Yes
            - i. Were the concerns noted?
                - i.a. Yes
            - ii. Did NOAA respond to the group or interest stakeholder?
                - ii.a. Yes
                - ii.b. No
            - iii. Was acknowledgement of the response received?
                - iii.a. Yes
                - iii.b. No
            - iv. Does NOAA have a plan of action to address the concern?
                - iv.a. Yes
                - iv.b. No
        - b. No
- B. No

II. Does the Corporate/Line Office devote 1.5% of its salary and compensation budget to training and development opportunities in accordance with the NOAA Employee Development and Training Policy?
- A. Yes
    1. Does the Corporate/Line Office track whether 1.5% of its salary and compensation and budget are allocated to training and developmental opportunities?
        - a. Yes
        - b. No
- B. No

III. Does each Line and Corporate Office maintain records of its training plans, expenditures and activities in an electronic system so as to be able to transmit required training data pursuant to 5 CFR 410.701(b)?
- A. Yes

1. Does each Line and Corporate Office report this training data to NOAA WFMO as prescribed in 5 CFR 410?
   a. Yes
      i. Are training and development records retained for five years?
         i.a. Yes
         i.b. No
   b. No
B. No

IV. Does each Corporate/Line Office ensure fair and equitable treatment in the selection and assignment of employees for training and development (per the NOAA Employee Development and Training Policy and set forth in U.S.C. 2310(b)(2))?
   A. Yes
      1. Can the workforce distribution (grade, occupation, office, race, sex, national origin, disability) of the participants for identified opportunities for the last fiscal year be tracked?
         a. Yes
            i. Were the opportunities provided in the last fiscal year balanced across all parts of the workforce?
               i.a. Yes
                  ii. Was there a group less utilized than others?
                     ii.a. Yes
                     ii.b. No
               i.b. No
         b. No
      2. No

V. Is the selection process reviewed periodically to ensure equal treatment regardless of race, sex, national origin or disability?
   A. Yes
   B. No

VI. Is there a system to track the participation of minorities, women and those with disabilities in leadership programs?
   A. Yes
   B. No

VII. Are there panels to review the applications of potential leadership program participants?
   A. Yes
      1. Do EEO officials participate in the application review process?
         a. Yes
         b. No
      2. Do minorities, women and those with disabilities participate in the application review process?
         a. Yes

           b. No

    B. No

VIII.   Are there interview panels for leadership programs?
- A. Yes
  - 1. Do EEO officials participate in interviews for leadership program participants?
    - a. Yes
    - b. No
  - 2. Do minorities, women and those with disabilities participate in the interview panels?
    - a. Yes
    - b. No
- B. No

IX. Are there selection panels formed for leadership programs?
- A. Yes
  - 1. Is EEO consulted when developmental opportunity selection panels are formed?
    - a. Yes
    - b. No
  - 2. Do EEO officials serve on selection panels (including Presidential Management Fellows (PMF) panels)?
    - a. Yes
    - b. No
  - 3. Do minorities, women and those with disabilities serve on the selection panels for leadership programs?
    - a. Yes
    - b. No
- B. No

X. Has criteria been established to ensure inclusion of minorities, women and those with disabilities in the review, interview and selection of leadership program applicants?
- A. Yes
- B. No

XI. Do those who manage leadership programs solicit minority and women participants?
- A. Yes
  - 1. Do those who manager leadership programs communicate with formal networks and employee groups about leadership programs?
    - a. Yes
    - b. No

B. No

XII. Do those who manage leadership programs and those who nominate, interview and select candidates and for leadership programs understand the legal requirements for EEO and AA which support diversity in the Federal Government?
- A. Yes
    1. Have those who manage leadership programs and those involved in nominating, interviewing and selecting leadership program candidates completed training in EEO and AA requirements that support diversity as required by NAO 215-101?
        - a. Yes
            - i. Was the training completed once within the last two years (per NAO 215-101)?
                - i.a. Yes
                - i.b. No
            - ii. Are those who don't take the training as required by NAO 215-101 held accountable?
                - ii.a. Yes
                - ii.b. No
        - b. No
    2. Are efforts being made to ensure EEO training is a requirement for those managers, supervisors and others who are involved in nominating, reviewing and selecting leadership program candidates?
        - a. Yes
        - b. No
- B. No

XIII. Does the Commerce Learning System (CLC) currently track information on employee skills and training?
- A. Yes
- B. No

XIV. Has a survey of current skills and training of NOAA's workforce been conducted to determine the availability of employees from the entire workforce that have skills required to meet agency mission needs?
- A. Yes
- B. No

XV. Are efforts being made to ensure that appropriate training and other developmental opportunities are available to employees at all grade levels, including management and executive training, and in all occupational areas, without regard to race, national origin, sex or disability?
- A. Yes
    1. Are employees' training needs assessed?
        - a. Yes
        - b. No
- B. No

XVI.   Are internal selection requirements and procedures for developmental opportunities job-related and consistent with business necessity?
- A. Yes
- B. No

XVII.   Do internal selection requirements and procedures for developmental opportunities include unnecessary barriers to full utilization of skills and training?
- A. Yes
    1. If barriers are job-related and consistent with business necessity, can the effect of the barrier be minimized?
        - a. Yes
        - b. No
- B. No

XVIII.   Are there a substantial number of EEO complaints wherein developmental opportunities, such as denial of training or non-selection for a detail, is identified as the issue?
- A. Yes
    1. Is there an identifiable trend e.g. particular group, supervisor, or office?
        - a. Yes
            - i. Is anything being done to address this trend (objective criteria, better communication of process and expectations?)
                - i.a. Yes
                - i.b. No
        - b. No
- B. No

XIX. Has the union, employee group, special emphasis group or other interested stakeholder expressed concern regarding the distribution of opportunities?
- A. Yes
    1. Were the concerns noted?
        - a. Yes
            - i. Did NOAA respond to the group or interested stakeholder?
                - i.a. Yes
                    - ii. Was acknowledgment of the response received?
                        - ii.a. Yes
                        - iib.   No [Further investigation as to why]
                    - iii. Does NOAA have a plan of action to address the concern?
                        - iiia. Yes
                        - iiib. No

                       i.b.   No

              b. No

     B. No

XX.   Are participants in NOAA Leadership Programs required to take EEO and Diversity training?

     A. Yes

     B. No

XXI.   Is there a NOAA requirement for all employees to have IDPs?

     A. Yes

          1. Is there a standard NOAA IDP form?

             a. Yes

             b. No

     B. No

XXII.   Is there a Corporate/Line Office requirement for all employees to have IDPs?

     A. Yes

          1. Are IDPs being used effectively?

             a. Yes

             b. No

     B. No

Disciplinary Action Tree

I. Were there disciplinary actions taken against members of the ethnic/racial/gender group?
1. Yes
   a. Were these actions based on conduct?
      i. Yes
         1. What type of actions were taken and how many?
            a. Letters of reprimand
            b. Counseling
            c. Mandatory training
            d. Suspension
            e. Termination
         2. Were these actions in parity with the workforce distribution?
            a. Yes
            b. No [Further investigation needed]
         3. Were these actions taken in parity with the workforce distribution?
            a. Yes
            b. No
               i. Examining the reasons for the disciplinary actions, are there reasons that appear more for this group than other groups?
                  1. Yes
                     a. Could these reasons have a cultural component?
                        i. Yes
                           i.a. Are these issues taken in to account re: disciplinary action and disciplinary action table formation (if available)?
                              i.a.1. Yes
                              i.a.2. No [Barrier, they should be]
                        ii. No
                  2. No
         4. Were actions taken against this group that was not taken against another group for the same offense?
            a. Yes [Investigation needed as to why]
            b. No

      ii. No
b. Were these actions based on performance?
      i. Yes
          1. What type of actions were taken and how many?
              a. Letters of reprimand
              b. Counseling
              c. Mandatory training
              d. Suspension
              e. Termination
          2. Were these actions in parity with the workforce distribution?
              a. Yes
              b. No [Further investigation needed]
          3. Were these actions taken in parity with the workforce distribution?
              a. Yes
              b. No
                  i. Examining the reasons for the disciplinary actions, are there reasons that appear more for this group than other groups?
                      1. Yes
                          a. Could these reasons have a cultural component?
                              i. Yes
                              i.a. Are these issues taken in to account re: disciplinary action and disciplinary action table formation (if available)?
                                  i.a. Yes
                                  i.b. No [Barrier, they should be]
                            ii. No
                      2. No
          4. Were actions taken against this group that was not taken against another group for the same offense?
              a. Yes
              b. No
      ii. No
c. Are there objective criteria used to determine disciplinary actions
      i. Yes
          1. Is this table reviewed periodically?
              a. Yes

          i. Is the EEO office consulted when reviewing the table?
             1. Yes
             2. No
        b. No
     ii. No
        1. Are the disciplinary actions left up to the supervisors' discretion?
          a. Yes
            i. Is there an ethnic/racial/gender related imbalance between supervisor's actions?
               1. Yes
                  a. Has there been an investigation in to this imbalance?
                     i. Yes
                       i.a. If the investigation showed an ethnic/racial/gender bias in supervisor's actions, has the supervisor been given counseling or EEO training?
                          i.a.1. Yes
                          i.a.2. No
                     ii. No
               2. No
          b. No
   d. Has any union, ombudsman, employee advocacy group, special emphasis group, or any other interested stake holder expressed concern regarding the rate of discipline for a particular group?
     i. Yes
        1. What were the concerns raised?
          a. What was the agency response?
     ii. No
  2. No
II. Were there discrimination complaints raised based on race/ethnicity or gender?
    1. Yes
        A. Were these complaints found to be valid?
          i. Yes
             a. Were these complaints in par with the agency's ethnic/racial or gender distribution?
               1. Yes
               2. No [Possible barrier]
          ii. No
    2. No

Separations Decision Tree

I. Can the workforce distribution of separations, including disability retirement, for the last fiscal year (grade, occupation, office, race, sex, national origin, disability) be tracked?
- A. Yes
- B. No

II. Did a higher percentage of a particular group separate from NOAA, or from a particular Line Office?
- A. Yes
- B. No

III. Is there a NOAA policy on exit interviews?
- A. Yes
- B. No

IV. Are exit interviews conducted?
- A. Yes
    1. Is the timing of the exit interview upon separation?
        - a. Yes
        - b. No
    2. Is the timing of the exit interview after separation?
        - a. Yes
        - b. No
    3. Is the data shared with WFMO and CRO?
        - a. Yes
        - b. No
    4. Is the data tracked and analyzed?
        - a. Yes
        - b. No
    5. Have any trends been identified?
        - a. Yes

i.   Where a trend has emerged, does NOAA have a plan to address the issue now, as well as prevent it from occurring in the future?
                                            i.a.   Yes
                                            i.b.   No
                    b.   No
        B.   No
                1.   Are there plans to conduct exit interviews in the future?
                    a.   Yes
                    b.   No
                            i.   Is there a reason why exit interviews are not to be conducted?
                                    i.a.   Yes
                                    i.b.   No
V.   Are efforts made to ensure that separations are conducted fairly and in a non-discriminatory manner?
        A.   Yes
                1.   Are those efforts currently underway?
                    a.   Yes
                    b.   No
        B.   No
VI.   Are there a substantial number of EEO complaints where constructive discharge is identified as the issue?
        A.   Yes
                1.   Is there an identifiable trend?
                    a.   Yes
                            i.   Is there anything being done to address this trend?
                                    i.a.   Yes
                                    i.b.   No
                    b.   No
        B.   No
VII.   Has the union, ombudsman, an employee advocacy group, special emphasis group, or any other interested stake holder expressed concern regarding the rate of separations for a particular group?
        A.   Yes
                1.   Were the concerns noted?
                    a.   Yes
                    b.   No
                2.   Did NOAA respond to the group or interested stake holder?

                    a. Yes

                             i. Was acknowledgment of the response received?

                                    ia. Yes

                                    ib. No

                            ii. Does NOAA have a plan of action to address the concern?

                                    i.a. Yes

                                    i.b. No

                  b. No

          B. No

VIII. Is separation data pulled and examined regularly?

          A. Yes

          B. No

IX. Is separation data made available to agency officials to conduct a barrier analysis, as required by MD-715?

          A. Yes

          B. No

                  1. If separation data is not made available as required by MD-715, is there a legitimate reason why?

                      a. Yes

                      b. No

X. Are reductions-in-force conducted in a non-discriminatory manner?

          A. Yes

                  1. Are procedures in place to ensure reductions-in-force are conducted in a non-discriminatory manner?

                      a. Yes

                      b. No

          B. No